

RECEIVED
BY MAIL

MAY 06 2019

CLERK, U.S. DISTRICT COURT
ST. PAUL, MN

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Christopher Ivey

Case No. 12-cv-30 (DWF/TNL)

Plaintiff,

vs.

PLAINTIFF'S MEET AND CONFER
STATEMENT PURSUANT TO
LOCAL RULE 7.1(a)

Daniel Williams, Michael Glavan,
William Gullickson, Scott Giannini,
Tara Halverson, Kevin Dreher,
and Matthew Dahl,

Defendants.

I, the undersigned, hereby certify that:

1. I, Christopher Ivey, the *pro se* Plaintiff in this matter, participated in a telephone call with Assistant Attorney General Brandon Boese, counsel for the Defendants, on March 29, 2019 regarding Defendants' willingness to produce the security video footage that Plaintiff had requested in discovery. Mr. Boese stated that a protective order would first have to be in place and that he would be sending me a stipulation for a protective order to consider. This telephone conversation was then memorialized by Mr. Boese in a letter dated April 1, 2019.
2. The subsequent stipulation for a protective order sent to me by Mr. Boese is unacceptable, primarily in that it does not allow me, the Plaintiff in this

SCANNED

MAY 07 2019 nah

U.S. DISTRICT COURT ST. PAUL

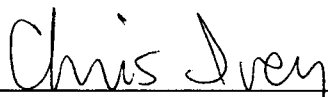
matter, to have access during the discovery process to any of the video footage of the incident at issue and either denies or greatly limits my access to other relevant information. Therefore, we are at an impasse, as our conversations and my discovery attempts have not lead to a resolution of or agreement on several issues relating to discovery.

3. I have made a good faith effort to resolve these disputes without court action.

4. Due to the time sensitive nature of the discovery process, Plaintiff does not have time for further discussion (such that any would ever prove fruitful) and can wait no longer to bring these Motions.

5. Therefore, this matter is properly before this Court on Plaintiff's Motion to Compel Discovery and Motion to Deny Confidential Designation.

Dated: May 2, 2019



Christopher Ivey, Plaintiff, *pro se*
1111 Highway 73
Moose Lake, MN 55767-9452